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March 3, 2025

VIA ELECTRONIC CASE FILING
Hon. Jessica G.L. Clarke
United States District Court
500 Pearl Street, Rm. 1040
New York, NY 10007

MEMO ENDORSED

Re: *Samuel Leo v. Siemens Medical Solutions, Inc., et al.*
SDNY 7:25-CV-00415-JGLC

Dear Judge Clarke:

I represent Plaintiff Samuel Leo in the above-referenced civil action. I was retained last week and entered my appearance on Friday, February 28, 2025. Currently pending are motions to dismiss filed by Siemens Medical Solutions, Inc. (ECF 4) and by IBEW Local 2222 (ECF 13).

With respect to IBEW's motion, Plaintiff intends to enter into a stipulation dismissing the union from the case. I have communicated this intention to the union's attorneys, and we anticipate filing the stipulation as soon as possible. With respect to Siemens' motion, Plaintiff intends to file an amended complaint that will resolve all of the issues raised in the motion. Siemens does not consent to this proposed amended complaint, however; therefore, Plaintiff must file a motion for leave to amend, pursuant to FRCP 15 and LR 15.1.

Because I am new to the case and have other pressing commitments (including mediations on Friday and next Monday, a summary judgment opposition due next Tuesday, and a bench trial scheduled for next Thursday), I am requesting until March 17, 2025, to file Plaintiff's motion for leave to amend, which will include clean and redlined copies of the proposed amended complaint in accordance with LR 15.1. Furthermore, I am requesting that the initial conference scheduled for March 12, 2025, be adjourned *sine die* pending the resolution of Plaintiff's motion to amend.

I have conferred with counsel for defendants, and they consent to this application.

Application GRANTED. Plaintiff to file motion for leave to amend by **March 17, 2025**. The conference scheduled for March 12, 2025 is ADJOURNED *sine die*. The Clerk of Court is directed to terminate ECF No. 17.

Respectfully submitted,

/s/ *Steven M. Warshawsky*

Steven M. Warshawsky

SO ORDERED.

Jessica Clarke

JESSICA G. L. CLARKE

United States District Judge

Dated: March 4, 2025

New York, New York